

EXHIBIT B

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

**IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION**

THIS DOCUMENT RELATES TO:

ALL ACTIONS

MDL No. 3047

Civil Case No. 4:22-md-03047-YGR

**DECLARATION OF [REDACTED] IN
SUPPORT OF META'S POSITION
REGARDING STATE ATTORNEYS
GENERAL PLAINTIFFS' REQUEST FOR
PRODUCTION NO. 102**

Judge: Honorable Yvonne Gonzalez Rogers
Magistrate Judge: Honorable Peter H. Kang

**DECLARATION OF [REDACTED] IN SUPPORT OF META'S POSITION REGARDING
STATE ATTORNEYS GENERAL PLAINTIFFS REQUEST FOR PRODUCTION NO.
102**

I, [REDACTED] hereby declare as follows:

1. I am a Data Scientist who works within the Legal Department at Meta Platforms, Inc. ("Meta"). I am part of the team that is responsible for collecting and producing structured data in order to support certain internal legal teams, outside counsel, and operations teams in

connection with legal proceedings. I submit this Declaration in support of Meta's position regarding the State Attorneys' General Request for Production No. 102. I make all statements in this Declaration based on my own personal knowledge and/or discussions with relevant personnel. If called upon to do so, I could and would competently testify as follows.

2. Meta maintains a data table containing information related to user reports of alleged violations of Facebook and Instagram policies made through Meta's official reporting feature (hereinafter "User Reporting Table"). This data includes, among other information, whether Meta found evidence that the reported account violated its policies, such as accounts that were reported as potentially belonging to users under 13 years old. As of March 14, 2025, Meta would need to analyze 27 TB of information, as stored in Meta's systems, consisting of 98 billion rows in order to obtain the full scope of information on user reports from the User Reporting Table. Meta also maintains a data table related to the enforcement of its policies, including records that Meta took enforcement actions relating to potential use of Meta's platforms by users under 13 years old (hereinafter "Enforcement Table"). As of March 14, 2025, Meta would need to analyze 246 TB of information, as stored in Meta's systems, consisting of 647 billion rows in order to obtain the full scope of information on enforcement actions from the Enforcement Table.

3. In addition, Meta maintains data tables related to users who have taken action to link multiple accounts within Facebook and Instagram ("Linked Accounts Tables"). There is one table containing, for each day the data is available, the currently existing linkages between Facebook and Instagram accounts (hereinafter the "Facebook to Instagram Linked Accounts Table"). As of March 14, 2025 and as currently stored in Meta's systems, the Facebook to Instagram Linked Accounts Table contains 13 TB of information and contains data for the last 50 days across approximately 12 trillion rows. There is another table containing, for each day that

the data is available, the currently existing linkages between Instagram accounts (hereinafter the “Instagram to Instagram Linked Accounts Table”). The Instagram to Instagram Linked Accounts data contains 4.2 TB of information and contains data for the last 90 days across 88 billion rows. The linkages currently in these tables may or may not have existed at points in time prior to the data currently in the tables. These tables have not previously been relied upon in producing data in response to Plaintiffs’ discovery requests.

4. To respond to Plaintiffs’ Request for Production No. 124, I utilized the data in the User Reporting Table to produce a data set reflecting, but not limited to, user reports about suspected under 13 users. Given the size of the table, I required support from a data engineer to filter the data down to a size that could be ingested by Meta’s data science tools. It took me 8 weeks to compute and export this data.

5. To identify all linked accounts associated with the user accounts reported or actioned as under 13, I would need to take the additional step of merging the User Reporting Table, the Enforcement Table, and the Linked Accounts Tables. Given typical compute limitations, data engineering will be required to substantially reduce the volume of data before I could perform these merges, and before I could then query and export this data. I am still determining what process would be involved in merging additional tables to identify soft-matched accounts associated with the user accounts reported or actioned as under 13.

6. Meta also maintains three tables containing, from the last 90 days, (a) all captions and comments on Instagram containing two digit numbers, (b) all posts and comments on Facebook containing two digit numbers, and (c) all directed posts on Facebook containing two digit numbers (hereinafter the “Two Digit Post Tables”). These tables have not previously been relied upon in producing data in response to Plaintiffs’ discovery requests.

7. The amount of data described in the Two Digit Post Tables is significant: more than 1.1 PB (over 1,000,000 GB) as currently stored in Meta's systems and as of March 14, 2025. The data contains over 3 trillion rows of data.

8. Due to the volume of the data in the Two Digit Post Tables, I cannot analyze or run keyword searches on this data in its current form. Based on my experience, attempting to query the data sources at issue here—without first reducing the data volume through data engineering effort—is not possible using Meta's data science tools. To attempt to query data of this size, Meta data engineers would need to write new, custom data pipelines to reduce the cumulative data across three tables to a size that can readily be queried.

I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct. Executed on March 18, 2025.

